

MAR 11 1982

5HR-TUB

Dale Wikre, Chief  
Division of Solid Waste  
Minnesota Pollution Control Agency  
1935 West County Road B-2  
Roseville, Minnesota 55113

US EPA RECORDS CENTER REGION 5



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Dear Mr. Wikre:

The purpose of this letter is review the accomplishments of our Agencies with respect to the tasks delineated in the USEPA/MPCA Cooperative Agreement amended on September 22, 1981. The specific tasks funded with Resource Conservation and Recovery Act funds, are known as Task 1, Well M23 investigation and abandonment; Task 2, sugar beet well investigation and abandonment and survey of on-site wells for abandonment procedures; and Task 3, water treatability study and cost-effectiveness analysis of treatment options. As you know the Reilly Tar and Chemical Company site in St. Louis Park Minnesota, represents a complex technical and legal situation. Therefore, management of a remedial response for the site requires a timely synthesis of technical and legal remedies. Over the past seven months we have seen the efforts of the Superfund Program relative to the implementation of Tasks 1 and 2, meld with the legal efforts of our Agencies to assure a complete solution to the cleanup.

#1 → W23  
#2 → treatability

During our efforts to implement Tasks 1 and 2, the approach has evolved where we submit proposals that require remedial action through the State of Minnesota, Attorney General's Office to the Reilly Tar and Chemical Company for their response and counter proposal. It appears a similar policy is evolving on the National level. This procedure unfortunately caused a measurable delay in the initiation of work for Tasks 1 and 2; but, we anticipate that we will routinely submit future scopes of work and requests for proposals to the company for their reply or comment within a specified time frame that will ensure unimpeded progress.

SF → AG  
↓  
Reilly for response

The reworking of Task 3 will expand upon treatability of the groundwater and will ensure a detailed and concise cost-effectiveness analysis of water treatment alternatives. This effort caused some delay but arose due to the concerns of our Agencies over the questions that remain regarding standards, treatability and the cost-effectiveness of the ultimate solution to the ground water problem. The culmination of our Agencies' work is manifested in the recent publication in the State Register for Request for Credentials which includes a request for proposals for the completion of Task 3, as revised. This task is of prime importance since it will direct our decisions to fund a remedial action alternative. We should now formally amend the Cooperative Agreement to recognize the changes in the Task 3 scope of work and the scheduling of the outputs, as well as the rescheduling of Tasks 1 and 2.

#3 → water treatability study



As you are aware, the City of St. Louis Park has taken an active role in the development of remedial action at the Reilly Tar site. Representatives from the MPCA and EPA met with City officials on February 19, 1982. The meeting was constructive and the City officials represented to us their willingness to implement a contingency plan that would provide, if necessary, an alternate source of water supply. While the EPA/MPCA investigation continues at the Reilly Tar site the City's work could be conducted concurrently if our Agencies are in agreement. Although we cannot be certain, at this time, as to the eligibility of the City's work, we can evaluate its relation with the Superfund activities at the site for input to a future eligibility determination.

*how many wells?*  
In order to fund upcoming activities, we recommend drafting a new Cooperative Agreement. The scope of work in the Cooperative Agreement will include the wells previously surveyed by the MDH/MPCA that are ready for abandonment procedures. This has been discussed at length with your Agency. It is critical, therefore, that the State submit a compilation of these wells as soon as possible while EPA prepares a draft agreement in conjunction with the State. The submittal of the compilation will become the time limiting factor in transmitting the Cooperative Agreement to Headquarters. The State activities relative to the tasks under the new Cooperative Agreement should be listed for cost-sharing obligation and reimbursement purposes.

Pursuant to the November 30, 1981, Headquarter's memo, "Verification of State Expenditures During CERCLA Credit Period," the State should request an audit, to validate the State accounting system and expenditures at the Reilly Tar site between January 1978 and December 31, 1980. Costs need not be completely compiled to make this request. The sooner the audit is requested the earlier EPA can make a determination regarding the State and City expenditures which are creditable to the 10% matching funds for Superfund money spent on the Reilly Tar site. We already expect a backlog of requests for audits for other states which may delay the opportunity for an early determination of creditable expenditures for Minnesota and the City of St. Louis Park. Therefore, we recommend your prompt attention to this situation.

We perceive the current Federal/State efforts on the Reilly Tar project to be well planned and thorough although somewhat behind the previously anticipated schedule. We trust that future tasks will be well timed as a result of our previous experience. The Reilly Tar project currently enjoys an extremely favorable position in the CERCLA program due to its high hazard ranking, its status as the States's top priority site, and



the relative lack of competition for funding from comparably advanced projects. The best way to insure this favorable status is to adhere to our proposed schedules to the maximum extent possible. For your information a copy of the most current activities chart is enclosed.

Region V shares the State's concern over the complex environmental problem stemming from the Reilly Tar site and looks forward to a continuation of our joint efforts to resolve the situation. As always, if I or my staff can be of further assistance, please let us know.

Sincerely yours,

The map is written to illustrate a general scope of work for the research to be conducted at the Reilly Tar Chemical site, St. Louis Park. Attached are various profiles of existing area characteristics of the research activity. The study area includes the volume of the site, bounded roughly by the dashed line. The contractor, if awarded, will be selected through a request for proposals that will be published by your office. The final scope of work will be determined at a meeting with the contractor. bcc: R. Wyer (WH548-E) from the Minnesota Pollution Control Agency, the United States Geological Survey and me.

N. Willis (WH-548-E)

Within the drift from the altitude of approximately 900 to 800 feet, there exists a volume of peat which stores polynuclear aromatic hydrocarbons (PAH). A discrete volume of hydrocarbon fluid is located beneath the peat. The drift material itself contains a lesser amount of sorbed PAH. Around 800 feet is the Plattville aquifer which is also polluted with PAH.

For the purpose of implementing either an interim drilling and treatment scheme we would like to determine:

- (1) the remaining adsorptive capacity of the peat deposit and drift,
- (2) the constituents of the discrete hydrocarbon fluid (HCF), and
- (3) the permeability of the HCF in the (a) peat, (b) hydrocarbon deposits and drift, and (c) groundwater in the Plattville aquifer.

The HCF has cores of the study site, which could be used by the contractor. The permeability tests, to be conducted, should include but not be limited to: (a) drilling at the proposed locations with monitoring of the water level in the peat deposits for further coring; (b) the further treatment by (1) sand application; and, (2) amendment of biological degradation of the HCF. (c) the peat by in-situ bioremediation. If funds permit, a study to determine the practicability of (1) a drilling well constructed at the site or (2) various microorganisms to immobilize the contaminants in the drift and peat can be initiated. However, in consideration points above, 1 through 3, to be the first priority.

If you have any questions about the information provided above or any questions of the research project, please call me at ITS 686-3607.

PBitter:lm 3/8/82

cc: Richard Ferguson (MPS)  
Michael Convery (MCM)  
Marc Holt (USGS)

cc: Remedial Response Branch 3/8/82